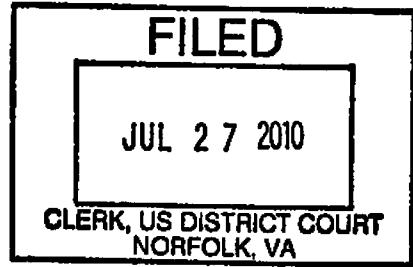


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA)
v.) CRIMINAL NO. 2:10cr 132
LINDA T. ROWLAND,) 18 U.S.C. § 1343
Defendant.) Wire Fraud
) (Count One)
) 18 U.S.C. § 1028A(a)(1)
) Aggravated Identity Theft
) (Counts Two & Three)
) Forfeiture

CRIMINAL INFORMATION

At all times relevant to all counts of this information:

1. LINDA T. ROWLAND, the defendant, co-owned and operated the Rowland Equipment Company, a family-owned business located at 600 West Main Street, Smithfield, Virginia 23430.
2. Rowland Equipment Company was primarily involved in the sale and maintenance of tractors, farming equipment and other outdoor power equipment.

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From in or about August 2000 through in or about August 2009, in the Eastern District of Virginia and elsewhere, LINDA T. ROWLAND, the defendant, devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, which scheme and artifice, and the

execution thereof, were in substance as follows:

2. The object of LINDA T. ROWLAND's scheme and artifice was to obtain money through fraudulent loans from various financial services companies, including AGCO Finance, Sheffield Financial, and TD Retail Card Services.

3. It was a part of said scheme and artifice that LINDA T. ROWLAND falsified loan agreements with these financial services companies for the supposed purchase of tractors, farming equipment and other outdoor power equipment from Rowland Equipment Company. To do so, the defendant used the names and forged the signatures of customers and other members of her local community. However, as the defendant well knew, these individuals did not sign the agreements, authorize the loans, or purchase the equipment listed in the agreements.

4. It was a further part of said scheme and artifice that LINDA T. ROWLAND used her home address and addresses associated with the Rowland Equipment Company as the buyer's mailing address in some of the fraudulent loan agreements. The defendant also obtained several Post Offices Boxes to use as the buyer's mailing address in other fraudulent loan agreements. In fact, these addresses did not belong to the individuals listed in the fraudulent loan agreements.

5. It was a further part of said scheme and artifice that LINDA T. ROWLAND caused the proceeds of these fraudulent loan agreements to be deposited in a corporate bank account. The fraudulently obtained monies were then used for the defendant's own personal benefit and to pay various Rowland Equipment Company operating expenses.

6. It was a further part of said scheme and artifice that LINDA T. ROWLAND made payments on these fraudulent loans to perpetuate the scheme.

7. As a result of the aforesaid scheme and artifice, LINDA T. ROWLAND obtained loan proceeds of at least \$1,300,000 to which she was not entitled.

8. On or about June 4, 2009, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice, LINDA T. ROWLAND, did cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals and pictures, that is, a wire transfer of loan proceeds in the amount of \$20,150 from Wells Fargo Bank in Des Moines, Iowa to Bank of Southside Virginia, in Smithfield, Virginia.

(In violation of Title 18, United States Code, Section 1343.)

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 25, 2006, in the Eastern District of Virginia and elsewhere, LINDA T. ROWLAND, the defendant, did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, that is, the name, date of birth and social security number of R.G., during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), namely, mail fraud in violation of 18 U.S.C. § 1341.

(In violation of Title 18, United States Code, Section 1028A(a)(1).)

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 7, 2008, in the Eastern District of Virginia and elsewhere, LINDA T. ROWLAND, the defendant, did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, that is, the name, date of birth and social security number of H.E., during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), namely, access device fraud in violation of 18 U.S.C. § 1029(a)(2).

(In violation of Title 18, United States Code, Section 1028A(a)(1).)

FORFEITURE

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant, LINDA T. ROWLAND, upon conviction of the offense set forth in Count One of this information shall forfeit to the United States any property which constitutes, or is derived from, proceeds she obtained directly or indirectly, as the result of such offense pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

The property subject to forfeiture includes but is not limited to the following:

A sum of money of at least \$1,300,000, which represents the proceeds of the offenses charged and which shall be reduced to a money judgment against the defendant in favor of the United States.

(In accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).)

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